

**Safety and Enforcement Division – PG&E DATA REQUEST**

Data Request No: SED 1

Date of this Request: September 18, 2018

Date Responses Due: **On or before October 2, 2018**

To: Sumeet Singh, Vice President [s1st@pge.com](mailto:s1st@pge.com)  
Portfolio Management & Engineering  
Pacific Gas and Electric Company  
6111 Bollinger Canyon Road, Room 4590-D  
San Ramon, CA 94583

From: Kenneth Bruno, Program Manager – Safety and Enforcement Division (SED),  
California Public Utilities Commission

Cc: Lee Palmer, Deputy Director, SED, CPUC  
Dennis Lee Program and Project Supervisor, SED, CPUC  
Darryl Gruen Attorney, SED, CPUC

## INSTRUCTIONS

**You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5, 314, 314.5, 581 and 582, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the SED contact(s) above with a copy to the SED attorney.**

*To the extent any data is confidential, please redact the applicable confidential information in a public version and provide SED an unredacted (confidential) version as well.*

These data requests should be considered continuing so that if any information provided changes, or new information becomes available that is responsive to a request, respondent is requested to supplement its response to SED.

If the respondent objects to any of these data requests, please submit specific objections within five business days. If respondent asserts any privilege, please provide within ten business days a privilege log listing all documents the respondent claims are privileged and the following information for each document: the basis for the privilege claimed, a summary of the purpose and subject of the document withheld, the date of the document, the author(s), and all recipients of the document.

In responding to each request please restate the text of the request prior to providing the response, and provide the name of the person(s) answering the request, the title of such person(s), and the name and title of the person they work for. With respect to each document produced, identify the number of the data request and question number that the document is responding to.

These data requests do not-supersede or excuse any pending oral data requests to the respondent unless that is expressly stated in the written data request.

**Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.**

**If a request, definition, or an instruction, is unclear, notify SED as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.**

**In answering these data requests, the respondent should adhere to the Commission's Rules of Practice and Procedure (Rules), with particular attention to Rule 1.1 of those Rules, which requires the respondent to "never mislead the Commission or its staff by an artifice or false statement of law or fact." The respondent should keep in mind that "Violations of Rule 1.1 can occur by a failure to correctly cite a proposition of law, *a lack of candor*, withholding information, providing incorrect information, or a failure to correct mistaken information."<sup>[1]</sup> SED expects the respondent to respond to these data requests with the highest level of candor.**

### **DEFINITIONS**

Unless the request indicates otherwise, the following definitions are applicable in providing the requested information.

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<sup>[1]</sup> Administrative Law Judge's Ruling Denying Southern California Edison Company's Motion For Summary Adjudication Of Alleged Rule 1.1 Violations Related To Data Request Responses Dated December 10, 2010, I.09-01-018, January 10, 2012, p. 6.

1. The terms “document,” “documents,” “documentary material”, or “documentation” include, without limitation, the following items, whether in electronic form, printed, recorded, or written or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions, and orders, intra-office and interoffice communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, calendars, work papers, graphs, notebooks, notes, charts, computations, plans, drawings, sketches, computer printouts, summaries of records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, bulletins, records or representations or publications of any kind (including microfilm, videotape, and records however produced or reproduced), electronic or mechanical or electrical records of any kind (including, without limitation, tapes, tape cassettes, discs, emails, and records) other data compilations (including without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, discs and recordings used in automated data processing, together with the programming instructions and other material necessary to translate, understand, or use the same), and other documents or tangible things of whatever description which constitute or contain information within the scope of these data requests.
2. “Relating to” or “related to” means concerning, addressing, referring, discussing, commenting upon, analyzing, mentioning or involving in any way.
3. “Identify”:
  - a. When used in reference to a person includes stating his or her full name, his or her most recent known business address and telephone number, and his or her present title or position;
  - b. When used in reference to documents includes stating the nature of the document (e.g., letter, memorandum), the date (if any), the title of the document, the identity of the author and/or the document, the location of the document, the identity of the person having possession, control or custody of the document, and the general subject matter of the document.
4. “Commission” as used herein refers to the California Public Utilities Commission.

5. “SED” as used herein refers to the Safety and Enforcement Division of the California Public Utilities Commission.
6. “PG&E” as used herein refers to Pacific Gas and Electric and/or its affiliates.

## **Questions**

1. In an excel spreadsheet please list all pipelines in the city of Lafayette subject to PU Code Section 958. Please include the following pipeline attributes and other information:
  - a. Line #
  - b. Segment # or GPS location
  - c. Length of pipeline in miles
  - d. Length of each segment in feet
  - e. Grade
  - f. Diameter
  - g. Wall thickness
  - h. MAOP
  - i. %SMYS @ MAOP
  - j. Long seam type
  - k. Longitudinal joint factor
  - l. Year installed
  - m. Design records available (yes/no)
  - n. Pressure tested after 1970?
  - o. Pressure tested before 1970? If so provide test details and duration.
  - p. Does PG&E have a pressure test record?
  - q. Date of actual or planned Subpart J - Hydrostatic test
  - r. HCA (yes/no)
  - s. Class Location
  - t. Will PG&E test the Segment?
  - u. Will PG&E replace the Segment?
  - v. For Segments PG&E will test or replace in compliance with PU Code Section 958, please provide the estimated date of doing so.
  
2. Has PG&E conducted any direct excavation and examination of pipeline coating in the City of Lafayette to examine for potential tree root interference?
  - a. If so, please provide each location examined, date examined, the findings, and the remedial actions or planned remedial actions if necessary.
  - b. Please state the number of trees that had removal justified as a result of the findings provided in response to question 2a.
  - c. Please provide a map showing each tree that had removal justified in response to question 2b.

- d. For each tree that PG&E had a justification to remove, please provide that justification. Please be sure that the justification includes an explanation as to why the trees identified for removal are a threat to a pipeline in the City of Lafayette.
- e. For the trees that have a justification for removal, has PG&E explored alternatives to protect the pipelines without removing these trees?
- f. If so, please explain.
- g. If PG&E has not provided the justifications and related information requested in questions 2b through 2e, why has PG&E selected over 200 trees for removal?
- h. For the 200+ trees slated for removal, does PG&E plan to remove the tree roots or simply remove the tree and stump? Please fully explain.
- i. As part of its agreement with the City of Lafayette to remove trees, how many trees did PG&E initially identify for removal?
- j. Did PG&E change the number of trees it communicated with the City of Lafayette that had to be removed?
- k. If the answer to question 2e is yes, please explain why.

Please send your response to the Originator, and a copy of your response to Project Coordinator and e-copies to the following SED representatives:

[Kennth.bruno@cpuc.ca.gov](mailto:Kennth.bruno@cpuc.ca.gov)

[Dennis.lee@cpuc.ca.gov](mailto:Dennis.lee@cpuc.ca.gov)

[Darryl.gruen@cpuc.ca.gov](mailto:Darryl.gruen@cpuc.ca.gov)

Please provide the above information as it becomes available but no later than the due date identified above. If you are unable to provide the information by this date, please notify the Originator **at least** 3 days before the data request is due and provide your best estimate of when the information can be provided. Please identify the person who provides the response and his/her phone number and email address.